

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STEPHANIE ALLEN, on behalf of herself, the
general public, and those similarly situated,

Plaintiff,

v.

TRAVEL GUARD GROUP, INC., AIG
TRAVEL, INC., and NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA,

Defendants.

Case No. 22-cv-06005-BHS

**STIPULATED MOTION AND
ORDER
FOR EXTENSION OF TIME**

NOTE FOR MOTION CALENDAR:
JANUARY 26, 2023

Pursuant to Western District of Washington Local Rules 7(d)(1) and 10(g), Plaintiff Stephanie Allen, individually and on behalf of a putative class of all other persons similarly situated (“Plaintiff”), and Defendants Travel Guard Group, Inc., AIG Travel, Inc., and National Union Fire Insurance Company of Pittsburgh, PA (together, the “Defendants”), file this Stipulated Motion for Extension of Time for Defendants to file a responsive pleading. The Motion is made with respect to the following facts and recitals:

WHEREAS, Plaintiff filed the Complaint on December 23, 2022;

WHEREAS, Defendant National Union Fire Insurance Company of Pittsburgh, PA

1 (“NUFIC”) was served on January 5, 2023, making January 26, 2023, the last day for NUFIC to
2 file a responsive pleading to the Complaint;

3 WHEREAS, the parties have conferred and agreed, subject to the Court’s approval, to
4 extend the deadline for NUFIC’s responsive pleading by seven (7) days, to February 2, 2023;

5 WHEREAS, this is the parties’ first stipulated motion for an extension of time in this
6 action;

7 WHEREAS, an extension of time will neither prejudice the parties nor result in undue
8 delay;

9 WHEREAS, in light of the above, the parties believe that good cause exists for entry of
10 the following stipulation:

11 NOW THEREFORE, by and through the undersigned counsel, the parties stipulate and
12 agree as follows, subject to the Court’s approval, that good cause appearing, NUFIC shall have
13 until February 2, 2023, to file its responsive pleading to the Complaint.

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15 Dated: January 26, 2023
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1 Presented By:

2 /s/ Stephen M. Raab

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7 Attorney for Plaintiff
8 STEPHANIE ALLEN

9 /s/ Eric Ormsby

10 Matthew D. Powers (*pro hac vice* application forthcoming)
11 Eric Ormsby (WSBA No. 59639, application for admission forthcoming)
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19 Attorneys for Defendants
20 TRAVEL GUARD GROUP, INC., AIG TRAVEL, INC., and NATIONAL UNION
21 FIRE INSURANCE COMPANY OF PITTSBURGH, PA
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[PROPOSED] ORDER

This matter, having come before the Court on the parties' stipulated motion for extension of time, and the Court have considered the motion and the record, hereby makes the following order.

It is ORDERED that Defendant National Union Fire Insurance Company of Pittsburgh, PA's deadline to file a responsive pleading to the Complaint is extended to February 2, 2023.

IT IS SO ORDERED.

Dated this 27th day of January, 2023



BENJAMIN H. SETTLE
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2023, I obtained the consent of Eric Ormsby to file the foregoing stipulated motion with his electronic signature, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and, with consent of the following, I will send notification of such filing to the following attorneys for Defendants:

- **Matthew D. Powers**
mpowers@omm.com
- **Eric Ormsby**
eormsby@omm.com

Dated this 26th day of January, 2023

By: /s/ Stephen M. Raab
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